

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BACKERTOP LICENSING LLC,

Plaintiff,

v.

CANARY CONNECT, INC.,

Defendant.

Civil Action No.: 1:22-cv-00572-CFC

BACKERTOP LICENSING LLC,

Plaintiff,

v.

AUGUST HOME, INC.,

Defendant.

Civil Action No.: 1:22-cv-00573-CFC

**NOTICE OF COMPLIANCE REGARDING JIMMY CHONG'S
PRODUCTION IN RESPONSE TO THIS COURT'S JUNE 8, 2023, ORDER
TO PRODUCE**

The undersigned, Jimmy Chong ("Respondent"), filed a letter to the Court on July 17, 2023 (D.I. 49). As detailed in the letter, Respondent was prepared to respond to this Court's previous production orders by July 17, 2023. However, on July 13, 2023, Respondent received email communication from Lori LaPray of Backertop Licensing, LLC ("Backertop"), indicating that attorney David Finger was retained to represent both LaPray and Backertop. The email communication did not authorize Respondent to re-produce the documents as the Court requested.

On July 12, attorney David Finger entered an appearance on behalf of Backertop and LaPray. Additionally, Mr. Finger filed Backertop's Objections (Canary D.I.48, August Home D.I. 52). On Tuesday, July 18, 2023, Respondent was informed by out-of-state Counsel, Ronald Burns, Esquire, that Backertop reconsidered its position, and granted him permission to make and file the ordered production. This communication was via email. Respondent never received such email however based on communication with Attorney Burns, Respondent will produce the documents.

The undersigned Respondent avers that he has made diligent efforts to search for, and produce, all responsive documents. Respondent avers that he is aware of, and compliant with, its present and ongoing obligations to produce all responsive document. Respondent has requested that these documents be hand delivered to Court Chambers on the afternoon of July 19, 2023 and will bring a copy to the July 20, 2023 hearing.

Dated: July 19, 2023

Respectfully submitted,

CHONG LAW FIRM P.A.

/s/ Jimmy Chong

Jimmy Chong (#4839)

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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I, Jimmy Chong, certify that on July 19, 2023 this document was electronically filed with the Clerk of the Court using the CM/ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Jimmy Chong
Jimmy Chong (#4839)